

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:)	Chapter 11
)	
FIELDWOOD ENERGY, LLC, <i>et al.</i>,¹)	Case No. 20-33948 (MI)
DEBTORS.)	
)	(Jointly Administered)
)	
)	

**JOINDER OF ZURICH AMERICAN INSURANCE COMPANY
IN THE OBJECTION FILED BY ASPEN AMERICAN INSURANCE COMPANY,
BERKLEY INSURANCE COMPANY, EVEREST REINSURANCE COMPANY AND
SIRIUS AMERICA INSURANCE COMPANY TO
DEBTORS MOTION TO EXTEND EXCLUSIVITY PERIODS
(relates to Dkt Nos. 625, 686)**

TO: THE HONORABLE MARVIN ISGUR,
UNITED STATES BANKRUPTCY JUDGE

Zurich American Insurance Company, (“**Zurich**”) files this *Joinder in the Limited Objection filed by Aspen American Insurance Company, Berkley Insurance Company, Everest Reinsurance Company and Sirius America Insurance Company to Debtors’ Motion to Extend Exclusivity Periods* and respectfully states as follows:

1. On December 1, 2020, the Debtors filed their *Motion for Entry of an Order Extending Exclusive Periods Pursuant to Section 1121(d) of Bankruptcy Code* (“**Exclusivity Motion**”). [Dkt No. 625]. On December 22, 2020, Aspen American Insurance Company, Berkley

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors’ primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

Insurance Company, Everest Reinsurance Company and Sirius America Insurance Company filed their limited objection thereto [Dkt No. 686]. As one of the Debtors' other sureties, Zurich has the same concerns expressed by these surety parties in their objections. Accordingly, Zurich joins the objection filed at Dkt. No. 686. Zurich also joins in to any other objection filed by any surety party.

2. As further background, Zurich is a surety company that issued four (4) surety bonds each dated November 9, 2015 ("**Zurich Bonds**") to obligees to which the Debtors owed direct or indirect performance obligations related to the Debtors' assets and operations. Pursuant to the issuance of the Zurich Bonds, certain Debtors executed and granted to Zurich certain rights pursuant to a General Indemnity Agreement dated September 18, 2014, as may be amended from time to time ("**Zurich GIA**"). Debtors have failed to pay past due, post-petition premium payments under the Zurich Bonds and Zurich GIA in the total amount of \$5,624,999.

3. Zurich also objects because it has requested additional information from Debtors which remain outstanding and Debtors should be obligated to respond to these requests prior to receiving any relief requested in the Exclusivity Motion.

WHEREFORE, Zurich prays that the Exclusivity Motion be denied unless and until its objections have been adequately addressed and approved by Zurich and that this Court grant such other and further relief to which Zurich may be entitled.

Respectfully submitted,

/s/ Duane J. Brescia
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*ATTORNEYS FOR ZURICH AMERICAN
INSURANCE COMPANY*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Objection was served via CM/ECF for the United States Bankruptcy Court for the Southern District of Texas to all parties entitled to such notice on this the 22nd day of December 2020.

/s/ Duane J. Brescia

Duane J. Brescia